

## **REMARKS**

### **Claim Objections**

The Examiner has objected to claims 19, 20, and 22 because they refer to canceled claim 18. Applicant has amended claims 19, 20, and 22 to refer to claim 17 rather than claim 18. Applicant respectfully submits that amended claims 19, 20, and 22 overcome the Examiner's objections.

### **Telephone Interview Summary**

On June 8, 2006 at 2:00 PM, Examiner Wozniak, inventor Mary Flanagan, Michael Garr, and Applicant's representative Carol Stovsky participated in a telephone interview to discuss the pending claims and prior art references cited by the Examiner. In the most recent office action, Examiner Wozniak relied on the Toole reference for teaching pre-editing of closed caption text in a source language.

During the interview, the inventor explained the difference between parsing and pre-editing of closed caption text. Parsing, which is taught by Toole, is an essential step in the machine translation process that involves preparing text for submission to a machine translator. In parsing, closed caption text is arranged in a particular way prior to submission but the content is not enhanced in any way. By contrast, pre-editing is a step that occurs prior to parsing and that involves changing and correcting the content of the text to produce a more accurate translation. Based on this understanding of the differences between parsing and pre-editing, Examiner Wozniak suggested amending the claims of the application to indicate clearly that pre-editing involves changing the

content of the closed caption text so that pre-edited text, rather than the original closed caption text in the source language, is submitted to the machine translator.

Comments under 35 U.S.C. § 103

The Examiner has rejected claims 1, 3, 5, 9, 10, 12, 13, and 17 under 35 U.S.C. § 103(a) as being unpatentable over Toole in view of Hiroi and further in view of Fu. The Examiner has rejected claims 6, 7, and 11 under 35 U.S.C. § 103(a) as being unpatentable over Toole in view of Hiroi and further in view of Fu and Kim. Finally, the Examiner has rejected claims 2, 14, 20, and 22 under 35 U.S.C. § 103(a) as being unpatentable over Toole in view of Hiroi and further in view of Fu and Kirkland. It is the Examiner's position Toole teaches the present invention except for input captions obtained by extracting closed captions from a program signal in a decoder. The Examiner relies on Hiroi to teach a closed caption decoder for extracting closed captions in a source language from a program signal comprising closed caption data and for receiving closed caption codes from the caption decoder at a translator. The Examiner relies on Fu to teach a button that enables a user to select a translated closed caption viewing option. The Examiner relies on Kirkland to teach a closed caption receiver having a text-to-speech synthesizer for producing an audio signal corresponding to closed caption text.

Applicant respectfully submits that Toole fails to teach pre-editing and therefore, cannot be combined with the Hiroi, Fu, and Kirkland references to reject the claims. The Examiner asserts that Toole describes on page 107, section 3.1 and page 108, section 3.2 the pre-editing feature of the present invention. In the cited passages,

however, Toole describes parsing rather than pre-editing. Parsing is an essential step in the machine translation process that involves preparing text for submission to a machine translator. Pre-editing in the present invention is a step that occurs prior to parsing and that involves changing and correcting the content of the text so that a more accurate translation is produced by the machine translator.

Consistent with the Examiner's suggestion during the telephone interview, Applicant has amended claims 1, 9, and 17 to indicate more clearly that pre-editing in the present invention involves changing the content of the closed caption text and that pre-edited text, rather than the original closed caption text in the source language, is submitted to the machine translator for translation. The output of the translation process is closed caption text in the target language which originates from the pre-edited text. It is respectfully submitted the amended claims patentably define the present invention. Applicant respectfully submits that Toole does not describe this feature of the present invention and therefore, cannot be combined with Hiroi, Fu, Kirkland, or any other reference cited previously by the Examiner to reject the amended claims.

Applicant respectfully submits that the present application is now in condition for allowance and such action is earnestly requested.

Respectfully submitted,

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